

WINSTON & STRAWN LLP  
101 California Street  
San Francisco, CA 94111-5894

Nicole M. Norris (SBN 222785)  
WINSTON & STRAWN LLP  
101 California Street, Suite 3900  
San Francisco, CA 94111-5894  
Telephone: 415-591-1000  
Facsimile: 415-591-1400  
Email: nnorris@winston.com

James F. Hurst (*Admitted Pro Hac Vice*)  
David J. Doyle (*Admitted Pro Hac Vice*)  
Samuel S. Park (*Admitted Pro Hac Vice*)  
WINSTON & STRAWN LLP  
35 W. Wacker Drive  
Chicago, IL 60601-9703  
Telephone: 312-558-5600  
Facsimile: 312-558-5700  
Email: jhurst@winston.com; ddoyle@winston.com;  
spark@winston.com

Attorneys for Defendant  
ABBOTT LABORATORIES

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**OAKLAND DIVISION**

SMITHKLINE BEECHEM CORPORATION, )  
d/b/a GLAXOSMITHKLINE, )

Plaintiff, )

vs. )

ABBOTT LABORATORIES, )

Defendant. )

Case No. C-07-5702 CW

Related to:

Case No. C-04-1511

**DECLARATION OF NICOLE M. NORRIS  
IN SUPPORT OF ABBOTT  
LABORATORIES' MOTION TO  
TRANSFER PURSUANT TO 28 U.S.C. §  
1404(a)**

**Date: February 21, 2008**

**Time: 2:00 p.m.**

**Courtroom: 2 (4th Floor)**

**Judge: Hon. Claudia Wilken**

WINSTON & STRAWN LLP  
101 California Street  
San Francisco, CA 94111-5894

1 I, Nicole M. Norris, declare:

2 1. I am an attorney at law, duly licensed to practice law in California and before  
3 this Court. I am an associate with the law firm of Winston & Strawn LLP, counsel of record for  
4 Abbott Laboratories ("Abbott"), and am authorized to make this declaration in that capacity.

5 2. I submit this declaration in support of Abbott Laboratories' Motion To  
6 Transfer Pursuant to 28 U.S.C. § 1404(a). The statements contained herein are based on my own  
7 personal knowledge unless otherwise stated.

8 3. A true and correct copy of an internal memo of Plaintiff GSK from February  
9 2004 is attached hereto as **Exhibit A**.

10 I declare under penalty of perjury under the laws of the United States of America that  
11 the foregoing is true and correct.

12 Executed in San Francisco, California, this 11th day of December 2007.

13  
14 /s/ Nicole M. Norris

15  
16 Nicole M. Norris

# EXHIBIT A

**EXHIBIT A TO DECLARATION OF NICOLE  
M. NORRIS IN SUPPORT OF ABBOTT  
LABORATORIES' MOTION TO TRANSFER  
PURSUANT TO 28 U.S.C. § 1404(a) FILED  
UNDER SEAL PURSUANT TO PROTECTIVE  
ORDER AND ABBOTT'S REQUEST TO FILE  
EXHIBITS UNDER SEAL**